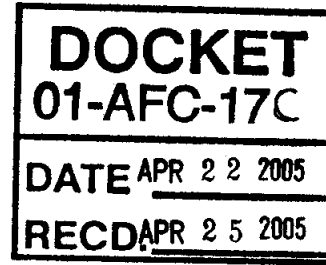


April 22, 2005



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Connie Bruins
Compliance Manager
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Subject: Amendment of Certification for Inland Empire Energy Center, 01-AFC-017

Ms. Bruins:

During a recent telephone conversation between Will Walters of Aspen Environmental and Tom Andrews of Sierra Research, we learned of an issue regarding the digitized site plan used for the air dispersion modeling for the Inland Empire Energy Center (IEEC) project. According to Mr. Walters, it appears that the digitized site plan did not include the air intake structures for the two gas turbines. Since these are rather substantial structures, Mr. Walters was concerned that the absence of these structures could significantly impact the air dispersion modeling performed as part of the March 2005 Amendment submitted to the CEC for the IEEC project. Mr. Walters also pointed out some minor issues regarding the location/alignment of some storage tanks and small structures. The following is a list of issues identified by Mr. Walters:

- Gas turbine air intake structures need to be added
- Recycled and thermal water storage tanks need to be moved approximately 16 meters east
- Fire water storage tank needs to be moved approximately 5 meters north
- Waste water storage tank needs to be moved approximately 5 meters south
- Gas conditioning area needs to be added north of gas turbines
- Dimensions of gas turbine builds need to be changed slightly to remove small fluting in shape of buildings

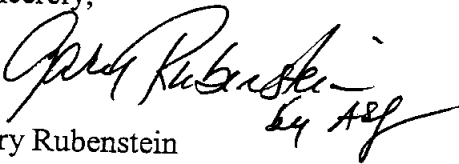
We corrected the digitized site plan to include the above changes and re-ran the facility-wide ISCST modeling for 1-hour CO, 24-hr PM₁₀, and annual PM₁₀ impacts. These pollutants and averaging periods were selected to ensure that both short- and long-term average maximum facility-wide impacts did not change as a result of the changes to the digitized site plan. As shown in Table 1, the revised modeling shows that there are no effects on maximum facility-wide project impacts associated with the changes to the

digitized site plan. Enclosed is a compact disk containing the modeling files associated with this modeling analysis.

Table 1 Comparison of Previous and Revised Modeling		
Pollutant/Averaging Period	Facility-Wide Maximum Impacts in March 2005 Amendment (ug/m3)	Revised Facility-Wide Maximum Impacts (ug/m3)
CO (1-hour average)	379.691	379.691
PM ₁₀ (24-hour average)	9.053	9.053
PM ₁₀ (annual average)	1.277	1.277

If you have any questions or need any additional information, please do not hesitate to contact us.

Sincerely,


Gary Rubenstein
Senior Partner

Enclosure

cc (with enclosure):

Brewster Birdsall, Aspen Environmental
Will Walters, Aspen Environmental
Li Chen, South Coast AQMD
CEC Dockets Office, Docket #01-AFC-17 ✓
Michael A. Hatfield, Calpine
Jennifer Morris, Calpine
Jim McLucas, Calpine
Barbara McBride, Calpine
Mark Smolley, Calpine

Document Management Scan Form (Revised 4-8-05)

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